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November 11, 1999

EXECUTIVE SECRETARY

VIA OVERNIGHT DELIVERY

K. David Waddell
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: New Edge Network, Inc. d/b/a New Edge Networks, Docket No. 99-00714

Dear Mr. Waddell:

New Edge Network, Inc. d/b/a New Edge Networks ("New Edge"), by undersigned counsel, hereby submits an original and thirteen (13) copies of additional information in support of the above-referenced application in response to Staff's October 28, 1999 Clarification Requests. Staff requests and New Edge's responses are set forth below.

Technical Qualifications

- (1) Provide information concerning the network it proposes to provision in Tennessee such as:
 - (a) Geographic area proposed- i.e. Nashville, Memphis, Knoxville, entire state, etc.
 - (b) Location of switches – i.e. cities.
 - (c) How network will be deployed.
 - (d) Type of equipment proposed – i.e. DMS-100 or 5Ess, etc. Fiber rings, etc.
- (a) **New Edge seeks authority to provide facilities-based and resold local exchange and interexchange services in small and medium sized areas throughout the state of Tennessee. Specifically, markets such as Knoxville, Chattanooga, Lebanon, Cleveland, Jackson, Tullahoma, Clarksville, Morristown and Oak Ridge are tentatively planned.**
- (b) **The equipment will be placed within central office locations of incumbent local carriers within the targeted small and medium sized markets. New Edge will collocate equipment in at least one central office within the targeted areas.**

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- (c) New Edge plans to collocate telecommunication equipment in central offices for access to unbundled loops. New Edge will obtain backbone transport services and facilities, including fiber-optic transmission facilities, from other certificated carriers. New Edge will deploy a network of leased circuits and will not be constructing its own cabling. The transport services and facilities will be used to connect New Edge equipment collocated in various incumbent central offices with New Edge's network transmission equipment, to provide trunking to New Edge's Internet Service Provider, CLEC, and share tenant service provider customers, and to connect New Edge's customers to certain IXC points of presence.
- (d) New Edge plans to collocate Digital Subscriber Line Access Multiplexers "DSLAM" and Asynchronous Transfer Mode "ATM" Routers in ILEC central offices. These equipment components support New Edge's strategy of acting as a Data Local Exchange Carrier (DLEC).
- (2) Provide information on whether Tennessee customers will be required to purchase Customer Premise Equipment (CPE) which could not be used with an ILEC systems, should the customer decide to go back to the ILEC.

Due to the technology for Synchronous Digital Subscriber Line (SDSL) services, the Customer Premise Equipment (CPE) is compatible exclusively with the DSLAM New Edge deploys. However, this DSLAM is widely used throughout the country. The industry is moving towards an open-system architecture and New Edge plans to modify its services as the technology and equipment becomes available. Wherever possible, New Edge attempts to use non-proprietary equipment.

Financial Qualifications:

- (1) Provide the cost of the proposed network, switches, or unbundled network (UNEs), etc.

Network Cost – New Edge estimates the following costs per central office installation:

<u>Cost Element</u>	<u>Cost</u>
Central Office Installation	\$74,600/CO
DSLAM/ATM Router/Test Equipment	\$83,167/CO
Transport/Month	\$4,300/CO
Unbundled Network Elements/Month	\$18/UNE

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- (2) Provide the projected financial statements, including income statement, balance statement and statement of cash flows for the next three (3) years with a capital budget outlining what specific equipment will be deployed for the Tennessee operations.

Please see Attachment 1. This information is proprietary and confidential and, as such, New Edge is submitting it under seal. New Edge respectfully requests that the information in Attachment 1 not be made a part of the public record in this proceeding or otherwise be made available for public disclosure.

Miscellaneous:

- (1) Provide a written certificate of service that notice of its application has been served on all eighteen (18) incumbent local exchange telephone companies in Tennessee.

Please see Attachment 2.

- (2) Provide a statement of the procedures the company has taken to ensure Y2K compliance or the status of the company's Y2K compliance.

New Edge does not anticipate that its operations will be affected by the Year 2000 problem given that the company was founded in July 1999, with no legacy systems. All hardware, software and operating systems have been purchased with vendor certification of Year 2000 compliance. In addition, New Edge requires all vendors and suppliers be Year 2000 compliant.

New Edge has installed an emergency power generation unit that will support the corporate office network and business hardware. New Edge has defined and implemented rigorous escalation procedures and policies to support problem detection and escalation. All monitoring and support staff have been trained in these procedures.

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Please date stamp the enclosed extra copy of this filing and return it in the enclosed self-addressed, postage-prepaid envelope provided. Should you have any questions concerning this matter, please do not hesitate to call. Thank you for your continued assistance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael P. Donahue". The signature is fluid and cursive, with the first name "Michael" and last name "Donahue" clearly distinguishable.

Eric J. Branfman

Michael P. Donahue

Counsel for New Edge Network, Inc.
d/b/a New Edge

Enclosures

cc: Darrell Whitis
Stacey Waddell

ATTACHMENT 1

Projected Financials

[FILED UNDER SEAL]

ATTACHMENT 2

Certificate of Service

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

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NOTICE OF APPLICATION

TO: Carriers Operating in the State of Tennessee

FROM: Eric J. Branfman, Esq.
Michael P. Donahue, Esq.

DATE: September 21, 1999

RE: Application of New Edge Network, Inc. d/b/a New Edge Networks for a Certificate of Public Convenience and Necessity to Provide Local Exchange and Interexchange Telecommunications Services Throughout the State of Tennessee

This is to notify you that the above-referenced telecommunications application was filed with the Tennessee Regulatory Authority ("TRA") on September 21, 1999. A copy of the application may be obtained from the TRA.

CERTIFICATE OF SERVICE

I, Michael P. Donahue, hereby certify that on this 21st day of September 1999, a copy of the foregoing notice was served via first class U.S. Mail on the following:

BellSouth Telecommunications, Inc.
Guy M. Hicks, General Counsel
333 Commerce Street
Nashville, TN 37201-3300

Sprint-United
Steve Parrott
Director-Regulatory Affairs
United Telephone-Southeast, Inc.
14111 Capital Boulevard
Wake Forrest, NC 27587-5900

Levoy Knowles, General Manager
Ben Lomand Rural Telephone Coop.
P.O. Box 670
McMinnville, TN 37110-0670
(931) 668-4132

Greg L. Anderson, General Manager
Bledsoe Telephone Coop.
P.O. Box 609
Pikeville, TN 37367-0609

Wayne Gassaway, General Manager
DeKalb Telephone Coop.
P.O. Box 247
Alexandria, TN 37012-0247

Fred L. Terry, General Manager
Highland Telephone Coop.
P.O. Box 119
Sunbright, TN 37872

F. Thomas Rowland, General Manager
North Central Telephone Coop.
P.O. Box 70
Lafayette, TN 37083-0070

Citizens Telecommunications Company
of Tennessee
Citizens Telecommunications Company
of the Volunteer State
Mike Swatts
State Regulatory Director, South
P.O. Box 770
300 Bland Street
Bluefield, WV 24701

Hobart G. Davis, General Manager
Skyline Telephone Membership Corp.
P.O. Box 759
West Jefferson, NC 28694-0759

Twin Lakes Telephone Coop.
P.O. Box 67
Gainesboro, TN 38562

West Kentucky Rural Telephone Coop.
P.O. Box 649
Mayfield, KY 42066-0649

Yorkville Telephone Coop.
P.O. Box 8
Yorkville, TN 38389

American Communications Services, Inc.
131 National Business Parkway, Suite 100
Annapolis Junction, MD 20701

ATS of Tennessee, Inc.
3915 Mendenhall Road South
Memphis, TN 38115

AT&T
511 Union Street, Suite 1010
Nashville, TN 37219

Brooks Fiber Communications
of TN, Inc.
800 South Gay Street
Suite 1800
Knoxville, TN 37924

BTI Communications, Inc.
4200 Six Forks Road
P.O. Box 150002
Raleigh, NC 27624

Comm. Depot, Inc.
889 Bendik Drive
Jackson, TN 38301

DeltaCom, Inc.
P.O. Box 1233
Arab, AL 35016

GTE Communications Corp.
1200 Walnut Hill Lane
Irving, TX 75038

Hyperion of TN, Inc.
222 Second Avenue North
Washington Square-Suite 422
Nashville, TN 37219

ICG Telecom Group, Inc.
2100 West End Avenue, Suite 620
Nashville, TN 37203

Intermedia Communications
3625 Queen Palm Drive
Tampa, FL 33619-1309

LCI International Telecom Corp.
8180 Greensboro Drive, Suite 800
McLean, VA 22102

Logix Communications Corporation
13429 N. Broadway Extension, Suite 200
Oklahoma City, OK 73114

MFS Intelnet of Tennessee, Inc.
515 East Amite Street, 4th Floor
Jackson, MS 39201

MCI Telecommunications Corp.
780 Johnston Ferry Road, Ste 700
Atlanta, GA 30342

New South Communications, LLC
355 Woodruff Road
Greenville, SC 29607

SouthEast Telephone LTD
317 Main Street, 4th Floor
Pikeville, KY 41501

TCG MidSouth
49 Music Square West
Suite 200
Nashville, TN 37203

Time Warner
P.O. Box 210706
Nashville, TN 37221

US West Interprise America, Inc.
1999 Broadway, Suite 700
Denver, CO 80202

WorldCom Technologies (LDDS)
Claire Daily, Director Legislative &
Regulatory Affairs
201 Energy Parkway, Suite 200
Lafayette, LA 70508

MFS Communications Company, Inc.
One Tower Lane, Suite 1600
Oakbrooke Terrace, IL 60181

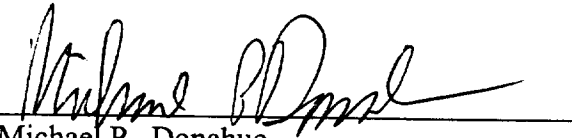
NEXTLINK Tennessee
105 Molloy Street, Suite 300
Nashville, TN 37201

Sprint Communications Company
3100 Cumberland Circle
Mailstop: GAATLN0802
Atlanta, GA 30339

Teligent, Inc.
8065 Leesburg Pike, Suite 400
Vienna, VA 22182

US LEC of Tennessee
401 N Tyron Street, Suite 100
Charlotte, NC 28202

WinStar Communications of TN, Inc.
7799 Leesburg Pike
Suite 401 South
Tyson's Corner, VA 22043


Michael P. Donahue